



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

201-15530

JUN 30 2004

OFFICE OF  
PREVENTION, PESTICIDES AND  
TOXIC SUBSTANCES

Joseph Caporossi  
Director, Safety, Health  
& Product Regulatory Compliance  
Cytex Industries Inc.  
Five Garret Mountain Plaza  
West Paterson, NJ 07424

04 AUG 25 PM 1:13

RECEIVED

Dear Mr. Caporossi:

Thank you for your letters dated November 22, 1999, and March 7, 2000, to the U.S. Environmental Protection Agency (EPA), regarding the High Production Volume (HPV) Challenge Program. I apologize for the lengthy delay in responding to your request.

First, let me thank you for your sponsorship of the six chemicals in addition to those you are sponsoring as a consortia member. Your letter also states that Cytex no longer manufactures or imports Benzophenone,2-hydroxy-4-methoxy- (CAS No. 131-57-7) or 1,6-Hexanediamine,N,N'-bis(2,2,6,6-tetramethyl-4-piperidinyl)- (CAS No. 61260-55-7). The Agency has received several letters from companies who state that they no longer manufacture or import HPV chemicals for which they filed reports under the 1990 IUR and which are consequently included on the HPV Challenge Program Chemical List. The Agency will post all such letters on the Chemical Right-to-Know (ChemRTK) website ([www.epa.gov/chemrtk](http://www.epa.gov/chemrtk)) so that the general public and other interested stakeholders may see that a specific company is no longer associated with the manufacture or importation of a specific chemical.

In your letter you requested that Carbamic acid, ethylthio-,O-isopropyl ester (CAS No. 141-98-0), be removed from consideration as an HPV chemical. Your letter also stated that Benzophenone,2,4-dihydroxy- (CAS No. 131-56-6) is a non-isolated intermediate in your processes and should also no longer be considered an HPV chemical.

As you may know, EPA posted draft guidance on procedures for removing chemicals that are no longer HPV from the scope of the voluntary HPV Challenge Program on its ChemRTK website at [www.epa.gov/chemrtk](http://www.epa.gov/chemrtk) in March, 1999. Based on EPA's review of all the pertinent IUR data from 1998 and 2002, EPA has determined that Benzophenone,2,4-dihydroxy- (CAS No. 131-56-6) and Carbamic acid, ethylthio-,O-isopropyl ester (CAS No. 141-98-0) **do meet** the

“no longer HPV” criteria. The HPV Challenge Program Chemical List will be annotated by designating these chemicals with a “5” to indicate that they are “no longer HPV.”

We will post your letter, accompanied by our reply, on the ChemRTK website as soon as possible. Should you have any questions pertaining to this response, please contact Diane Sheridan at (202) 564-4770. If you have general questions concerning the HPV Challenge Program, please submit them through the ChemRTK website comment button or through the TSCA Assistance Information Service (TSCA Hotline) at (202) 554-1404. The TSCA Hotline can also be reached via e-mail at [tsc-hotline@epa.gov](mailto:tsc-hotline@epa.gov).

Sincerely,

Wardner G. Penberthy  
Acting Director  
Chemical Control Division

cc: AR201